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35 **UNITED STATES DISTRICT COURT**
36 NORTHERN DISTRICT OF CALIFORNIA

37 ANIBAL RODRIGUEZ, JULIEANNA
 38 MUNIZ, ELIZA CAMBAY, SAL
 39 CATALDO, EMIR GOENAGA, JULIAN
 40 SANTIAGO, HAROLD NYANJOM,
 41 KELLIE NYANJOM, and SUSAN LYNN
 42 HARVEY, individually and on behalf of all
 43 others similarly situated,

44 Plaintiffs,

45 vs.

46 GOOGLE LLC,

47 Defendant.

48 Case No.: 3:20-cv-04688

49 **ADMINISTRATIVE MOTION TO**
50 CONSIDER WHETHER ANOTHER
51 PARTY'S MATERIAL SHOULD BE
52 SEALED

53 Magistrate Judge Alex G. Tse
 54 Courtroom A – 15th Floor
 55 Trial Date: Not Yet Set

1 Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether
2 Google LLC’s (“Google”) material should be sealed. The material is attached to the parties’ Joint
3 Letter Brief Regarding Plaintiffs’ Challenge to Google’s Decision to Claw Back a Document as
4 Privileged (“Clawback Joint Letter Brief”).

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Declaration of Bryson Santaguida	Google	Entirety	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order

11 Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the
12 responsibility to establish that its designated material is sealable.

13 Dated: December 3, 2021

Respectfully submitted,

15 By: */s/ Amanda Bonn*

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